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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:23-cr-00145-AN

Plaintiff,

**MOTION FOR TEMPORARY
RELEASE TO ATTEND FUNERAL**

v.

**(Oral Argument and Expedited
Consideration Requested)**

JONTAE JONES,

Defendant.

Comes now the defendant, Jontae Jones, and moves this Court for an order authorizing his temporary release to attend the funeral of his grandfather, Samuel Howard Sr., on Thursday, November 9, 2023. The government objects to this motion. Given the time-sensitive nature of this pleading, Mr. Jones requests a hearing to address his request on Wednesday, November 8, 2023.

Mr. Jones' grandfather passed away and a funeral is scheduled for November 9, 2023, beginning at 10:00 a.m. in Portland. [https://www.legacy.com/us/obituaries/name/samuel-howard-
obituary?id=53522327](https://www.legacy.com/us/obituaries/name/samuel-howard-obituary?id=53522327). Mr. Jones was close to his grandfather and attending his funeral would mean a great deal to him.

Mr. Jones' family has made arrangements for Avis Moore, Mr. Jones' mother, to pick him up, drive him to the funeral and return him to custody later the same day. Mr. Jones will work with

pretrial services to facilitate his trip to the funeral and is willing to abide by any conditions the Court places on him during his temporary release from custody.

For all the reasons set forth in this motion, and for additional reasons to be discussed at a hearing on this matter, Mr. Jones requests that the Court schedule a hearing for Wednesday, November 8, 2023, to discuss his temporary release from custody to attend his grandfather's funeral.

RESPECTFULLY submitted this 7th of November, 2023.

/s/ Megha Desai

Megha Desai

Assistant Federal Public Defender